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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
In re	:	
	:	Chapter 11
Aman Resorts Group Limited,	:	-
	:	Case No. 16-10517 (SCC)
Debtor.	:	
	X	

## DECLARATION OF MATTHEW B. STEIN IN SUPPORT OF MOTION TO TRANSFER VENUE OF RELATED BANKRUPTCY CASES FROM THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF FLORIDA TO THIS COURT

MATTHEW B. STEIN, hereby declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of his knowledge, information and belief:

- 1. I am a partner in the law firm of Kasowitz Benson Torres LLP, counsel for Aman Resorts Group Limited ("<u>ARGL</u>") and Tarek Investments Limited ("<u>Tarek</u>") in the above-captioned Chapter 11 case. I submit this declaration in support of ARGL and Tarek's Motion to Transfer Venue of Related Bankruptcy Cases From the United States Bankruptcy Court For the Southern District of Florida to This Court, dated August 22, 2017 (the "<u>Motion</u>"), and present the Court with the following documents and statement in connection therewith.
- 2. On August 15, 2017, the directors of ARGL and PHRGL instructed me to contact immediately the Trustee and all parties in PHRGL's Chapter 7 Case and in ARGL's Chapter 11

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case (together, the "<u>Later-Filed Cases</u>") pending in the United States Bankruptcy Court for the Souther District of Florida (the "Florida Bankruptcy Court") to apprise them of the fraudulent nature of the cases and demand their prompt withdrawal.

- 3. Attached hereto as <u>Exhibit A</u> is a true and correct copy of a printout from the BVI Register of Directors, indicating that Peak Hotels and Resorts Group Limited ("<u>PHRGL</u>") was incorporated on January 17, 2014 and that Mr. Omar Amanat ("<u>Amanat</u>") was appointed as a director of PHRGL on January 20, 2014.
- 4. Attached hereto as <u>Exhibit B</u> is a true and correct copy of a notice that PHRGL had been struck off the BVI corporate register on August 12, 2016.
- 5. Attached hereto as <u>Exhibit C</u> is a true and correct copy of an e-mail I received from counsel for High-Def Zone, Inc. ("<u>High-Def</u>") on August 16, 2017 at 2:57 p.m., stating that the basis for listing 1500 Bay Board 1582S, Miami Beach, FL 33138 as PHRGL's address in the involuntary petition which commenced a Chapter 7 case against PHRGL ("<u>PHRGL's Chapter 7</u> <u>Case</u>") was that "[t]hat is where the bills were sent as Amanat lived there at the time and some equipment was installed there."
- 6. Attached hereto as Exhibit D is a true and correct copy of an e-mail I received from counsel for High-Def on August 16, 2017 at 1:27 p.m., stating that High-Def's claim related to the set-up of video equipment for PHRGL's purported office in Miami and that "Amanat was the sole director and shareholder of the company at the time."
- 7. Attached hereto as <u>Exhibit E</u> is a true and correct copy of an e-mail I received from counsel for PHRGL's Chapter 7 trustee (the "<u>Trustee</u>") on August 21, 2017 at 5:49 p.m., stating that "[A]manat provided some creditor information and appeared at the 341 meeting."
  - 8. Attached hereto as Exhibit F is a true and correct copy of a notice that liquidators

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had been appointed over ARGL.

9. Attached hereto as Exhibit G is a true and correct copy of an e-mail I received

from counsel for the Trustee on August 18, 2017 at 6:38 p.m., pledging that no substantive action

would be taken in either of the Later-Filed Cases pending further discussions and investigation.

I declare under penalty of perjury that, to the best of my knowledge and after reasonable

inquiry, the foregoing is true and correct.

Dated: August 22, 2017

New York, New York

/s/ Matthew B. Stein

Matthew B. Stein

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